

**PATTON BOGGS LLP**  
ATTORNEYS AT LAW

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May 10, 2001

Benjamin L. Ginsberg  
202-457-6405  
bginsberg@pattonboggs.com

VIA COURIER

Jeff S. Jordan  
Supervisory Attorney  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
MAY 11 2 17 PM '01

Re: MUR 5197  
1999 Republican Senate-House Dinner Committee and  
Christopher J. Ward, as Treasurer

Dear Mr. Jordan:

This responds to the April 23, 2001 letter from the Federal Election Commission ("Commission") notifying the 1999 Republican Senate-House Dinner Committee and Chris Ward, as treasurer (collectively "Dinner Committee"), of the complaint filed against it by the National Taxpayers Union ("NTU") in the above referenced Matter Under Review ("MUR"). The complaint was received on April 26, 2001. The Statement of Designation of Counsel form is attached. (See attachment 1.) For the reasons set forth below, there is no basis in law or fact supporting the complaint and the Commission should dismiss it as applied to the Dinner Committee.

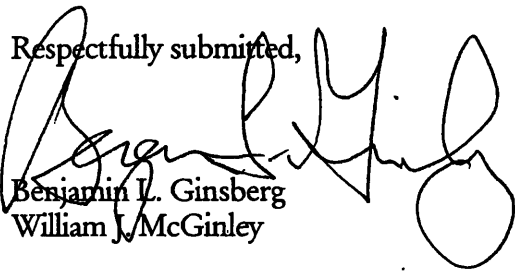
The Dinner Committee terminated on August 25, 2000. (See attachment 2.) It was a joint fundraising committee established pursuant to 11 C.F.R. § 102.17 by the National Republican Senatorial Committee ("NRSC") and the National Republican Congressional Committee ("NRCC"). As such, the Dinner Committee established accounts to accept contributions for the NRSC and NRCC before transferring all proceeds, minus expenses, to the participating Committees. The Dinner Committee also established several non-federal accounts

Jeff S. Jordan  
May 10, 2001  
Page 2

in accordance with 11 C.F.R. § 102.17(c)(3), including a building fund account.<sup>1</sup> See also 2 U.S.C. § 431(8)(B)(viii) & 431(9)(B)(viii); 11 C.F.R. § 114.1(a)(2)(ix). During the Dinner Committee's existence, no questions or allegations were raised by the Commission or any other third party concerning the legality of these donations.

The Dinner Committee no longer exists. Accordingly, the Commission should dismiss the complaint as applied to the Dinner Committee.

Respectfully submitted,

  
Benjamin L. Ginsberg  
William J. McGinley

Attachments

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<sup>1</sup> The donations from Freddie Mac and Fannie Mae were deposited into the Dinner Committee's building fund account. (See attachment 3.) The donations were not deposited into any account used to finance any election activity. The proceeds from the Dinner Committee's building fund account were disbursed to the NRCC and NRSC's building fund accounts. (See id.) These donations were not used by the Dinner Committee in connection with any election at the federal, state or local level. Accordingly, the Dinner Committee complied with the building fund donation, disbursement and reporting requirements under the Act and Commission regulations.

# STATEMENT OF DESIGNATION OF COUNSEL

MUR 5197

NAME OF COUNSEL: Benjamin L. Ginsberg

FIRM: Patton Boggs, LLP

ADDRESS: 2550 M Street, NW

Washington, DC 20037

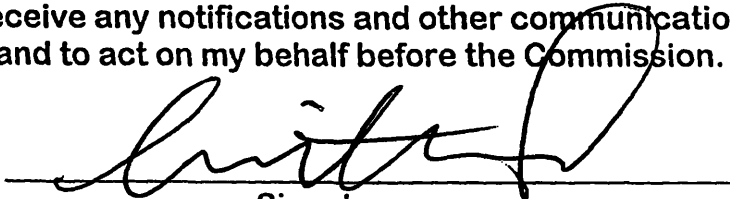
TELEPHONE: ( 202 ) 457-6000

FAX: ( 202 ) 457-6315

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/1/01

Date

  
Signature

RESPONDENT'S NAME: The 1999 Republican Senate-House Dinner Committee

ADDRESS: Christopher J. Ward, Treasurer

6302 Massachusetts Avenue

Bethesda, MD 20816

TELEPHONE: HOME ( 301 ) 263-9085

BUSINESS ( 202 ) 479-7042



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-K

Christopher J. Ward, Treasurer  
The 1999 Republican Senate-House  
Dinner Committee  
PO Box 1721  
Washington, DC 20013

AUG 25 2000

Identification Number: C00343129

Reference: July Quarterly Report (4/1/00-6/30/00)

Dear Mr. Ward:

Your committee's filing has been accepted as a valid termination because it meets the conditions set forth in 2 U.S.C. §433(d) and 11 CFR §102.3. Your committee is no longer required to file reports on a periodic basis. However, 2 U.S.C. §432(d) and 11 CFR §§102.9(e) and 104.14(b)(3) require that you maintain your records and copies of reports for inspection for at least three (3) years. In addition, you may be required to respond to Commission requests for information regarding your committee's federal election activity and previously filed reports.

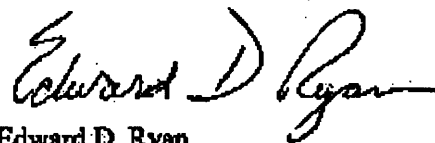
If your committee again becomes active in federal elections, it will be required to re-register with the Commission in accordance with the Federal Election Campaign Act and applicable Regulations. Your committee will be treated as a new entity by the Commission and should register as a new committee on FEC FORM 1, pursuant to 2 U.S.C. §§432(g) and 433(a).

Political committees and separate segregated funds which once attained multicandidate committee status and subsequently terminated will, upon re-registration, again be required to meet the criteria set forth in 2 U.S.C. §441a(a)(4).

If you have any questions concerning your status and requirements, please contact the Reports Analysis Division on the toll-free number, (800) 424-9530 (at the prompt

press 1, then press 2 to reach the Reports Analysis Division. My local number is (202) 694-1130.

Sincerely,



Edward D. Ryan  
Reports Analyst  
Reports Analysis Division

209

FEDERAL ELECTION COMMISSION  
REVIEW INDEX - (R) (1999-2000)DATE 8/22/2000  
PAGE 1

1999 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE; THE

CHRISTOPHER J. WARD

PO BOX 1721

WASHINGTON

PARTY NON-QUALIFIED

ID NC00343129

FILING FREQUENCY: TERMINATED

JOINT FUNDRAISING CITE

DC 20013

≡	RPT	A	P	REC	DATE	PGS	BEG	IMAGE	COVERAGE	DATES	BEG	CASH	RECEIPTS	DISBURSE	END	CASH	DEBTS	BY	PASS	III	DATE	SHT	BAS	REV
T	TYPE	I	G																	COMPLETE	TO	RAR	COMPLET	

1	N				2/17/99	2		P9034333557													NOT RECD		2/28/99	
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RD	NY	2			12/15/99	4		99034953281	1/01/99	6/30/99														
RD	NY	2			3/22/00	3		20035370509	1/01/99	6/30/99														
RD	NY	3			1/08/00	4		20035004826	1/01/99	6/30/99														
RD	NY	3			1/08/00	5		20035004830	1/01/99	6/30/99														
RD	NY	3			4/13/00	4		20035414785	1/01/99	6/30/99														
RD	YE	3			5/04/00	4		20035564187	7/01/99	12/31/99														
RD	TER	2			4/12/00	3		20035410396		1/31/00														

3	NY	N	P		8/02/99	181		99034710371	1/01/99	6/30/99	0	2478253	2458488	19755	0	8/11/99	8/17/99	11/18/99						
3	NY	A	P		8/31/99	18		99034793209	1/01/99	6/30/99	0	2478253	2458488	19755	0	8/10/99		11/18/99						
3	NY	A	P		12/30/99	179		20035003054	1/01/99	6/30/99	0	2478253	2458488	19755	0	1/21/00		3/01/00						
3	NY	A	P		4/06/00	4		20035410284	1/01/99	6/30/99	-	-	-	-	-	4/17/00		5/30/00						
3	TER	N	P		1/31/00	63		20035212458	7/01/99	12/31/99	19755	424001	443758	0	0	3/06/00		3/28/00						
3	Q1	N	P		4/16/00	7		20035502152	1/01/00	3/31/00	0	0	0	0	0	4/28/00		5/30/00						
3	Q2	N	P		7/13/00	7		20035770622	4/01/00	6/30/00	0	0	0	0	0	7/24/00		7/31/00						
TOTAL												2902254	2802254											

**SCHEDULE I**  
(effective 1/1/91)**AGGREGATION PAGE  
NON-FEDERAL ACCOUNTS OF NATIONAL PARTY  
COMMITTEES**

(Use a separate Aggregation Page for each nonfederal account)

<b>NAME OF FEDERAL COMMITTEE</b>		
THE 1999 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE		
<b>NAME OF ACCOUNT</b>	<b>COVERAGE PERIOD</b>	
THE 1999 REPUBLICAN SENATE-HOUSE DINNER BUILDING FUND	FROM 7/1/99	TO 12/31/99
	<b>COLUMN A TOTAL THIS PERIOD</b>	<b>COLUMN B YEAR-TO-DATE</b>
<b>RECEIPTS</b> (ATTACH SUPPORTING MEMO SCHEDULE A ITEMIZING RECEIPTS AGGREGATING IN EXCESS OF \$250 DURING THE CALENDAR YEAR)		
1. TOTAL RECEIPTS:	\$156,767.00	\$335,767.00
<b>DISBURSEMENTS:</b> (ATTACH SUPPORTING MEMO SCHEDULE B ITEMIZING DISBURSEMENTS AGGREGATING IN EXCESS OF \$400 DURING THE CALENDAR YEAR)		
2. TRANSFERS TO FEDERAL OR ALLOCATION ACCOUNT FOR ALLOCABLE EXPENSES	\$0.00	\$0.00
3. TRANSFERS TO STATE/LOCAL PARTY ORGANIZATIONS	\$0.00	\$0.00
4. DIRECT STATE/LOCAL CANDIDATE SUPPORT	\$0.00	\$0.00
5. OTHER DISBURSEMENTS	\$165,767.00	\$335,767.00
6. TOTAL DISBURSEMENTS (ADD 2, 3, 4, AND 5)	\$165,767.00	\$335,767.00
<b>SUMMARY</b>		
7. BEGINNING CASH ON HAND (FOR COLUMN B USE CASH AS OF JANUARY 1ST)	\$9,000.00	\$0.00
8. RECEIPTS (FROM LINE 1)	\$156,767.00	\$335,767.00
9. SUBTOTAL	\$165,767.00	\$335,767.00
10. DISBURSEMENTS (FROM LINE 6)	\$165,767.00	\$335,767.00
11. ENDING CASH ON HAND	\$0.00	\$0.00

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE 1 OF 1  
FOR LINE NUMBER 1

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (In Full)

THE 1999 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE (BUILDING FUND)

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>FANNIE MAE</b> <b>3900 WISCONSIN AVENUE, NW</b> <b>WASHINGTON, DC 20016</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>N/A</b> <b>Occupation</b> <b>N/A</b>	<b>Date (month, day, year)</b> <b>7/7/99</b>	<b>Amount of Each Receipt This Period</b> <b>\$50,000.00</b> <b>Aggregate Year-to-Date &gt; \$50,000.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>FREDDIE MAE</b> <b>8100 JONES BRANCH DRIVE</b> <b>MCLEAN, VA 22102</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>N/A</b> <b>Occupation</b> <b>N/A</b>	<b>Date (month, day, year)</b> <b>9/9/99</b>	<b>Amount of Each Receipt This Period</b> <b>\$100,000.00</b> <b>Aggregate Year-to-Date &gt; \$100,000.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>NATIONAL MINING ASSOCIATION</b> <b>1130 SEVENTEENTH STREET, NW</b> <b>WASHINGTON, DC 20036</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>N/A</b> <b>Occupation</b> <b>N/A</b>	<b>Date (month, day, year)</b> <b>7/6/99</b>	<b>Amount of Each Receipt This Period</b> <b>\$6,667.00</b> <b>Aggregate Year-to-Date &gt; \$6,667.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  <b>Aggregate Year-to-Date &gt; \$</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  <b>Aggregate Year-to-Date &gt; \$</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  <b>Aggregate Year-to-Date &gt; \$</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  <b>Aggregate Year-to-Date &gt; \$</b>

SUBTOTAL of Receipts This Page (optional) \$156,667.00

TOTAL This Period (last page this line number only) \$156,667.00

FEBANDEA



## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE 1 OF 1  
FOR LINE NUMBER 3

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NAME OF COMMITTEE (in Full)

THE 1999 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET, NE WASHINGTON, DC 20002	Transfer of Proceeds Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/29/99 9/29/99 12/29/99	\$30,000.00 \$52,500.00 \$367.41
NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE 320 FIRST STREET, SE WASHINGTON, DC 20003	Transfer of Proceeds Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/29/99 9/29/99 12/29/99	\$30,000.00 \$52,500.00 \$367.41
C. Full Name, Mailing Address and ZIP Code BB&T 1909 K STREET, NW WASHINGTON, DC 20006	Service Charges Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/99	\$32.19
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$165,767.00

TOTAL This Period (list page this line number only)

\$165,767.00

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